



**CONESTOGA-ROVERS  
& ASSOCIATES**

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September 28, 2010

Reference No. 056393

Mr. Michael Berkoff  
Remedial Project Manager  
U.S. Environmental Protection Agency - Region V  
Superfund Division, Remedial Response Section #2  
77 West Jackson Boulevard (SR - 6J)  
Chicago, Illinois 60604 - 3590



Dear Mr. Berkoff:

Re: Remedial Action Design Specification Variance - Landfill Gas Vents  
12th Street Landfill Operable Unit No. 4  
Allied Paper, Inc. / Portage Creek / Kalamazoo River Superfund Site  
Allegan and Kalamazoo County

As discussed during the weekly meeting held on September 15, 2010, Conestoga-Rovers & Associates (CRA) has prepared this letter, on behalf of Weyerhaeuser Company, to document a variance to final construction design drawings pertaining to the installation and construction of the passive gas vents (Construction Drawing C-12, Design Detail 12), included as part of the Final Design Report approved by the United States Environmental Protection Agency (U.S. EPA) on March 25, 2010 for the 12<sup>th</sup> Street Landfill Site, Operable Unit No. 4 of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site, located in Plainwell, Michigan (Site). The design variance pertains to the final installation of the landfill gas vents installed at the Site, with respect to the placement of additional 12-ounce (oz) Needle Punched Non-Woven Geotextile material (12-oz geotextile), to add additional protection for the 40-mil LLDPE liner material.

As part of the selected Remedial Action (RA) implementation, a total of 11 passive gas vents were installed at the Site in accordance with the final approved design drawings (Drawings C-12: Design Detail 12 - Gas Vent). In addition to the 12-oz geotextile material shown on Design Detail 12, an additional piece of 12-oz geotextile was placed around each gas vent stand pipe, covering the 1-2 inch clear stone. The additional 12-oz geotextile was then heat sealed to the existing 12-oz geotextile, lining the base of each gas vent, fully encapsulating the 1-2 inch clear stone. In doing so, the additional 12-oz geotextile adds protection against abrasion, punctures, or other potential damage to the liner, by eliminated any direct contact between the 1-2 inch clear stone and the 40-mil LLDPE liner material.

REGISTERED COMPANY TM  
**ISO 9001**  
ENGINEERING DESIGN



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Should you have any questions or require any additional information, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Gregory A. Carli, P. E.

AS/cs/24

Encl.

c.c.: J. Saric (U.S. EPA) - electronic only  
L. Kirby-Miles (U.S. EPA) - electronic only  
S. Chummar (U.S. EPA) - electronic only  
T. Prendiville (U.S. EPA) - electronic only  
S. Borries (U.S. EPA) - electronic only  
R. Frey (U.S. EPA) - electronic only  
S. Hutsell (CH2MHILL) - electronic only  
P. Bucholtz (MDNRE) - three hard copies  
K. Zakrzewski (MDNRE) - electronic only  
R. Gay (Weyerhaeuser) - electronic only  
M. Lebo (Weyerhaeuser) - electronic only  
J. Jackowski (Weyerhaeuser) - electronic only  
M. Erickson (Arcadis) - electronic only  
D. Penniman (Arcadis) - electronic only  
G. Griffith (Georgia-Pacific LLC) - electronic only  
J. Keiser (CH2M Hill) - electronic only  
J. Dembowski (CRA) - electronic only  
A. Stadnyk (CRA) - electronic only